

Robert W. Quinn, Jr. Federal Government Affairs Vice President Suite 1000 1120 20th Street NW Washington DC 20036 202 457 3851 FAX 202 457 2545

May 29, 2002

Electronic Filing
Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12<sup>th</sup> St., SW, Room TWB-204
Washington, DC 20554

Re: FCC Seeks Comment On AT&T Request to Contribute to Universal Service
Based on Projected Revenues, CC Docket No. 96-45, DA No. 02-376;

Federal-State Joint Board on Universal Service, CC Docket No. 96-45; 1998
Biennial Regulatory Review – Streamlined Contributor Reporting Requirements
Associated with Administration of Telecommunications Relay Service, North
American Numbering Plan, Local Number Portability, and Universal Service
Support Mechanisms, CC Docket 98-171; Telecommunications Services for
Individuals with Hearing Speech Disabilities and the Americans with Disabilities
Act of 1990, CC Docket No. 90-571; Administration of the North American
Numbering Plan and North American Numbering Plan Cost Recovery
Contribution Factor and Fund Size, CC Docket No. 92-237, NSD File No. L-0072; Number Resource Optimization, CC Docket No. 99-200; Telephone Number
Portability, CC Docket No. 95-116; and Truth-in-Billing and Billing Format, CC
Docket No. 98-170;

<u>In the Matter of Numbering Resource Optimization</u>, CC Docket No. 99-200;

<u>In the Matter of BellSouth Tariff FCC No. 1, Transmittal No. 629, WCB/PPD No. 02-08</u>

Dear Ms. Dortch:

On Tuesday May 28, 2002, I had a conversation with Dorothy Attwood, Chief of the Wireline Competition Bureau, to discuss issues related to AT&T's request to, if necessary, a

modify or waive the rule that requires carriers to complete the Telecommunications Reporting Worksheet using revenue figures that are lagged by six months and instead utilize a projection of revenues for assessments made beginning July 1, 2002. I stressed the need for the Commission to grant AT&T's request to, on an interim basis, contribute to universal service based on projected revenues as a first step towards reforming the universal service assessment and collection mechanism.

In addition, I also urged that the Commission grant AT&T's Petition for Reconsideration of the Numbering Resource Optimization Order issued by the Commission originally on December 28, 2001 for all of the reasons contained therein. I stressed the fact that permitting Incumbent LECs (and only incumbent LECs) to recover carrier specific costs of thousand block number pooling through switched access charges constitutes an implicit subsidy mechanism that is prohibited by the Act and that violates the requirement for a competitively neutral cost recovery mechanism.

The positions expressed by AT&T were consistent with those contained in the Comments and ex parte filings previously made in the aforementioned dockets. One copy of this Notice is being submitted for each of the referenced proceedings in accordance with the Commission's rules.

Very truly yours,

Robert W. Zuinn, J.

cc: Dorothy Attwood